

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-20**

**Respondent:** Joseph Gansert

**Title:** Director

**REQUEST:** DTE Record Request

**DATED:** October 23, 2002

**ITEM:** RR-DTE 101 Has the Nortel contract that supports the discount reflected in Exhibit VZ-37, part C-P3, page 2, line 35 been provided as part of the record in this case? If so, please provide a specific reference to that document.

**REPLY:** The contract (BC 18841) was provided in Verizon MA's response to information request ATT 3-1

VZ RR # 83

**Verizon New England Inc.  
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**D.T.E. 01-20**

**Respondent:** Joseph Gansert

**Title:** Director

**REQUEST:** DTE Record Request

**DATED:** October 23, 2002

**ITEM:** RR-DTE 102 For the 16 switches shown in the table on page 10 of the Rebuttal Testimony of Catherine Pitts, identify the winning vendor, the date the bid was awarded and the cost per line of the losing vendor.

**REPLY:** The information presented is based upon Ms. Pitts' format. The vendor switch bid comparison data shows the attached bid information. Verizon MA considers this information to be confidential and third party proprietary. This information will be provided to parties subject to the terms of a mutually acceptable Protective Agreement.

VZ RR # 84

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-20**

**Respondent:** Joseph Gansert  
**Title:** Director

**REQUEST:** DTE Record Request

**DATED:** October 23, 2002

**ITEM:** RR-DTE 103 Using Verizon's response to DTE VZ-3-7, Workpaper Part B, identify the switches included in this workpaper that are not included in the table shown on page 10 of the Pitts rebuttal testimony. For each of these switches, identify the switch vendor and indicate whether the award was a result of a competitive bid or a contract.

**REPLY:** The following list identifies 17 switches (and the respective switch vendor) that were included in Workpaper, Part B but not included in the Pitts rebuttal testimony. The Pitts testimony included three Virginia switches (Hull St., Granby St., and Petersburg) that were not included in workpaper Part B. Although Verizon received bids for these three switches, the jobs were eventually cancelled. All switches listed below except the four labeled "no bid" were competitively bid

Keyport - Lucent  
Dumont- Lucent  
Glassboro – Lucent  
Haldon- Lucent  
Bedford – Siemens  
Ridgewood – Lucent  
Westfield- Lucent  
Midtown CG2 - Lucent  
Nichols – Lucent – Not Bid  
Palmer - Nortel  
Waverly – Lucent – Not Bid  
Owego – Lucent- Not Bid  
Falls Church - Siemens

**RR-DTE 103**  
**REPLY (Cont.)**

Athol – Nortel  
Petersham – Lucent  
Brockland – Lucent  
Pearl Street – Nortel – Not Bid

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